

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

GREENLEAF COMPASSIONATE CARE  
CENTER, INC.,  
*Plaintiff,*

v.

MATTHEW SANTACROCE, in his official  
capacity as Deputy Director of the Rhode  
Island Department of Business Regulation;  
ERICA FERRELLI, in her official capacity as  
Chief of the Office of Cannabis Regulation  
within the Rhode Island Department of  
Business Regulation; KIMBERLY AHERN,  
in her official capacity as Chair of the Rhode  
Island Cannabis Control Commission;  
ROBERT JACQUARD, in his official capacity  
as Commissioner on the Rhode Island Cannabis  
Control Commission; OLAYIWOLA  
ODUYINGBO, in his official capacity as  
Commissioner on the Rhode Island Cannabis  
Control Commission; and LOCAL 328 OF THE  
UNITED FOOD AND COMMERCIAL  
WORKERS UNION,  
*Defendants.*

C.A. No. 23-cv-282

**ASSENTED TO MOTION FOR EXTENSION OF TIME FOR STATE DEFENDANTS TO  
RESPOND TO PLAINTIFF’S COMPLAINT**

NOW COME, the Defendants, Matthew Santacroce, in his official capacity as Deputy  
Director of the Rhode Island Department of Business Regulation; Erica Ferrelli, in her official  
capacity as Chief of the Office of Cannabis Regulation within the Rhode Island Department of  
Business Regulation; Kimberly Ahern, in her official capacity as Chair of the Rhode Island  
Cannabis Control Commission; Robert Jacquard, in his official capacity as Commissioner on the  
Rhode Island Cannabis Control Commission; Olayiwola Oduyingbo, in his official capacity as  
Commissioner on the Rhode Island Cannabis Control Commission (hereinafter “State

Defendants”), and hereby move this Honorable Court to extend until September 7, 2023 the time in which State Defendants have to respond to Plaintiff’s Complaint, ECF 1. Counsel for the Plaintiff and Defendant Local 328 have assented to this Motion.

Respectfully Submitted,

Matthew Santacroce, in his official capacity as  
Deputy Director of the Rhode Island Department of  
Business Regulation; Erica Ferrelli, in her official  
capacity as Chief of the Office of Cannabis  
Regulation within the Rhode Island Department of  
Business Regulation; Kimberly Ahern, in her  
official capacity as Chair of the Rhode Island  
Cannabis Control Commission; Robert Jacquard, in  
his official capacity as Commissioner on the Rhode  
Island Cannabis Control Commission; Olayiwola  
Oduyingbo, in his official capacity as  
Commissioner on the Rhode Island Cannabis  
Control Commission

State Defendants,

BY:

**PETER F. NERONHA**  
**ATTORNEY GENERAL**

/s/ Chrisanne Wyrzykowski  
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**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that on August 7, 2023, I filed and served the herein document through the electronic filing system on the attorneys of record. The herein document electronically filed and served is available for viewing and/or downloading from the ECF Filing System.

/s/ Chelsea Baittinger